

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

PREMIER ELECTRONICS, L.L.C,)	
)	
Plaintiff,)	CASE NO. 3:18-cv-2036-S
v.)	
)	
ADT LLC,)	
)	
Defendant.)	
)	

DEFENDANT ADT, LLC'S AMENDED TRIAL EXHIBIT LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(A)(iii) and this Court's Order Granting Joint Motion to Extend Certain Pretrial Deadlines [ECF No. 63], Defendant ADT LLC hereby files its Amended Trial Exhibit List as follows:

Ex. No.	Description	Bates	Objection(s)
AGREED JOINT EXHIBITS¹			
J-1.	Security System Agreement for Phillips Creek Ranch [Premier Bulk Monitoring Agreement]	Premier-1902 – 1918	<i>n/a</i>
J-2.	Phillips Creek Ranch Request for Proposal – Home Security Provider	Premier-1921 - 1925	<i>n/a</i>
J-3.	ADT Proposal to Phillips Creek Ranch for 24/7 Security Monitoring & Services	PCR 00144 – 150	<i>n/a</i>
J-4.	Phillips Creek Ranch Community Association, Inc. Alarm Monitoring Agreement [ADT Bulk Monitoring Agreement]	PCR 002 – 009	<i>n/a</i>

¹ Pursuant to a stipulation between the Parties, the following exhibits are deemed Joint Exhibits admissible at trial.

ADT'S EXHIBITS			
1.	April 21, 2016 Notice of Termination	Insight 00000063	
2.	April 7, 2016 call from Greg Barnett to ADT Customer Care	ECF No. 25 at 209-213	
3.	April 12, 2016 email from Ryan Thompson to Greg Barnett re Smith Thompson Proposal	PCR 00143	
4.	April 14, 2016 email from Shawn Griffith to Greg Barnett re Premier pricing for add-ons	Insight 00000018	
5.	January 9, 2015 email from Shawn Griffith to Bruce Crawford	Insight 00000001	
6.	April 5, 2016 email from Greg Barnett to Tony Ruggeri re PCR customers unhappy with Premier	Insight 00000020	
7.	February 25, 2015 PCR Community Association Minutes of Board of Directors Meeting	Insight 00000059	
8.	June 17, 2015 PCR Community Association Minutes of Board of Directors Meeting	Insight 00000051	
9.	May 8, 2016 Letter from Premier to PCR Residents	PCR 0053 - 0054	
10.	May 17, 2016 Letter from Premier to PCR Residents	PCR 0055	
11.	May 10, 2016 email from Shawn Griffith to Tony Ruggeri re ADT	Premier-1940	
12.	May 17, 2018 email thread between Danielle Page and Linda White re adding security monitoring to ancillary service agreements	Premier-2623	
13.	July 11, 2016 notice from Greg Barnett to PCR Homeowners re alarm monitoring options	PCR 0088	
14.	June 13, 2014 email from Bruce Crawford to Shawn Griffith re homeowner contract length exceeding HOA agreement length	Insight 00000015	
15.	September 13, 2016 email thread from Shawn Griffith to Tony Ruggeri and Jake Wagner re PCR	Premier-1932 – 1937	
16.	September 26, 2016 email from Shawn Griffith to Patrick Vedra re balances due on PCR accounts	Insight 00000272	
17.	List of customers who signed supplemental services agreements with Premier after	Premier's Responses to	

	April 21, 2016	ADT's First Interrogatories at Ex. 9	
18.	May 16, 2016 email thread between Mike McCormick and Danielle page re questions on monitoring service	Premier-10615 - 10616	
19.	PCR Community Association Check Nos. 2942, 2996, 3063	ECF No. 25 at 231-233	
20.	January 15, 2020 Letter from Premier to PCR Homeowners	ECF No. 33 at Ex. A	
21.	March 31, 2015 email from Nereida Orozco to Bruce Crawford re PCR resident complaints about Premier's pricing	Insight 00000082	
22.	December 4, 2019 Letter from Premier to Light Farms Homeowners	Served via email on April 3, 2020.	
23.	Various PCR Customer Correspondence to Premier (itemized below) ²		
23-a.	June 15, 2016 email from K. Hottowe to Premier	2475 – 2479	<i>n/a</i>
23-b.	June 6, 2016 email from Hanu Koya to Premier	2791	<i>n/a</i>
23-c.	June 10, 2016 letter from Jerry Davidson	3356	<i>n/a</i>
23-d.	June 2, 2016 letter from Brad Cantrill	3405	<i>n/a</i>
23-e.	June 16, 2016 letter from Mithun Samani	4447	<i>n/a</i>
23-f.	May 23, 2016 demand letter from attorneys representing Ravindra Akhud	5915 - 5916	<i>n/a</i>
23-g.	May 20, 2016 email from Jithendra Kudrekod	5429	<i>n/a</i>
23-h.	September 1, 2017 email from Alison Goff	5589	<i>n/a</i>
23-i.	June 27, 2016 letter from Josh Chambers	5697	<i>n/a</i>
23-j.	June 10, 2016 email from Carolina Salas	6171	<i>n/a</i>
23-k.	June 13, 2016 letter from Dena Nitsche	6174	<i>n/a</i>
23-l.	June 16, 2016 email from Melissa Dickerson	6238	<i>n/a</i>
23-m.	July 21, 2016 email from Jeff Dispenza	6270 – 6272	<i>n/a</i>
23-n.	June 13, 2016 email from Srikanth Tirumala	6344 – 6350	<i>n/a</i>
23-o.	June 6, 2016 email from Lin Aquiles Amundarain	6534	<i>n/a</i>
23-p.	No Date- Consumer Complaint Activity Report	6777	<i>n/a</i>
23-q.	July 26, 2016 email from Bryan C. Duncan	8274	<i>n/a</i>
23-r.	October 6, 2016 demand letter from	9102 – 9103	<i>n/a</i>

² Pursuant to a stipulation between the parties, Premier agrees that each of these individual exhibits are admissible at trial.

	attorneys representing Manoj Narayanan		
23-s.	July 1, 2016 letter from Kiran Pavuluru	9185	<i>n/a</i>
23-t.	June 13, 2016 letter from Steve Hill	9197	<i>n/a</i>
23-u.	September 4, 2015 email from Carolina Salas	10518	<i>n/a</i>
23-v.	July 7, 2016 letter from Jeffrey Baker	10601	<i>n/a</i>
23-w.	June 7, 2016 letter from Scott and Therese Blackburn	10813	<i>n/a</i>
23-x.	July 15, 2016 letter from Stephanie Bierman	11063 – 11064	<i>n/a</i>
23-y.	June 8, 2016 letter from Govrham Bhukke	11582	<i>n/a</i>
23-z.	June 20, 2016 email from Jackson D'silva	14434	<i>n/a</i>
23-aa.	September 5, 2016 email from Therese Blackburn	14464	<i>n/a</i>
23-bb.	June 16, 2016 email from Jason Landkamer	14588 – 14589	<i>n/a</i>
23-cc.	June 18, 2016 letter from Mariah and JC Manzanares	14654;	<i>n/a</i>
23-dd.	June 20, 2016 demand letter from Manoj Narayanan	14660 - 14663	<i>n/a</i>
24.	July 18, 2016 email between Janett McMillan and Eileen Arbulu re there is nothing ADT can do about individual customers being tied to longer term agreements with Premier	Served via email on April 3, 2020.	
25.	Plaintiff Premier's Answers to Defendant ADT's First Interrogatories		
26.	Plaintiff Premier's Responses to Defendant ADT's First Requests for Admission		
27.	Curriculum vitae of William Urban		
28.	Curriculum vitae of Stephen Gribbon		
	Exhibits needed for rebuttal or impeachment (Pursuant to Local Rule 26.2, documents and other things intended to be used for impeachment/rebuttal only are not identified on this list.)		
	Without waiving any objections or conceding the admissibility or relevance of any such exhibits, all exhibits listed by Plaintiff		
	Charts, diagrams, photographs, summaries, compilations, or demonstrative exhibits being prepared for presentation at trial		
ADT reserves the right to identify additional exhibits that may become available through additional investigation or discovery, or that otherwise may appear necessary to the			

prosecution of this action after further preparation for trial. ADT further reserves the right to not offer any of the exhibits on this list or to object to the admissibility of any such exhibits.

Dated January 11, 2021

Respectfully submitted,

By: /s/ Eric S. Boos

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